

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

JONATHAN MORRISON, )  
Plaintiff, )  
v. ) Civil Action No.  
KILOLO KIJAKAZI, Acting Commissioner )  
of the Social Security Administration, )  
Defendant. )

## **COMPLAINT**

1. Plaintiff, Jonathan Morrison, is a resident of Houston, Harris County, Texas.
2. This case is an appeal under 42 U.S.C. § 405(g) of a final administrative decision of Defendant, which denied Plaintiff Supplemental Security Income (SSI) under Title XVI and Disability Insurance Benefits (DIB) under Title II of the Social Security Act.
3. This action is an appeal from a final administrative decision dated August 31, 2022, denying Plaintiff's claim. Plaintiff's identifying designation is BNC #21DL104D28219.
4. This action is commenced within the appropriate time period set forth in the Action of Appeals Council on Request for Review, dated November 30, 2022, and received by Plaintiff on or about December 5, 2022.
5. Plaintiff has exhausted administrative remedies in this matter and this Court has jurisdiction for judicial review pursuant to 42 U.S.C. § 405(g).
6. Plaintiff is disabled.
7. Plaintiff was denied SSI and DIB by Defendant as it was her determination that Plaintiff is not disabled under the Social Security Act.

8. It is Plaintiff's contention that the denial of his disability claim is not supported by substantial evidence under the standards set forth by 42 U.S.C. § 405(g) and all other applicable laws and regulations, including the weight of the evidence, his credibility, the medical evidence of record, and any and all other applicable evidentiary issues, both in law and in fact, and therefore the denial of his claim should be reversed or remanded for further administrative proceedings.

WHEREFORE the Plaintiff seeks judicial review by this Court and the entry of a judgment for such relief as may be proper, including reversal of the Agency's decision or, in the alternative remand for further proceedings, as well as costs.

/s/*Karl E. Osterhout*  
KARL E. OSTERHOUT  
Trial Attorney for Plaintiff  
PA Bar ID 49658  
521 Cedar Way, Suite 200  
Oakmont, PA 15139  
Phone: 412-794-8003  
Fax: 412-794-8050  
Karl@mydisabilityattorney.com  
*January 16, 2023*